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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **AT SEATTLE**

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11 **ALAN KWANG,**

12  
13 **Plaintiff,**

14 **v.**

15 **ROYAL CANIN USA, INC., et al.**

16 **Defendants.**  
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**Case No. 2:18-cv-00178-MJP**

**Hon. Marsha J. Pechman**

**STIPULATION AND ~~[PROPOSED]~~**  
**ORDER REQUESTING**  
**CONTINUANCE OF DISCOVERY**  
**CUTOFF**

**Noting Date: December 14, 2018**

1 Plaintiff, ALAN KWANG, and Defendant, ROYAL CANIN USA, INC.,  
2 hereby stipulate as follows:

3 WHEREAS, the trial date currently set for this matter is May 13, 2019, and  
4 the current discovery cutoff date is December 14, 2018.

5 WHEREAS, the Parties have been diligent in their pursuit of discovery,  
6 having exchanged and responded to written discovery requests and taking the  
7 depositions of key witnesses.

8 WHEREAS, the scheduling of witness depositions was difficult due to the  
9 place of residence of the witnesses along with calendaring conflicts of the witnesses  
10 and the attorneys in this matter.

11 WHEREAS, during witness depositions, the existence of documents and  
12 information, potentially relevant to this litigation, was brought to light and the  
13 witnesses provided contradictory testimony regarding these documents and  
14 information.

15 WHEREAS, considering this information, the Parties agree to a continuance  
16 of the discovery cutoff to January 14, 2019, to allow for a written request to be made  
17 of these documents and information.

18 WHEREAS, this is the first request for a continuance of any date in this  
19 action and the Parties request a short continuance to allow them to complete their  
20 discovery. This request will not impact the current trial date.

21 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and  
22 between the respective attorneys of record for Plaintiff and Defendant, subject to  
23 the Court's approval as follows:

- 24 1. That the current discovery cutoff date of December 14, 2018,  
25 shall be continued to January 14, 2019;  
26

1                   2.     That all other dates set by the June 19, 2018 Order Setting Trial  
2                               shall remain unchanged.

3     **IT IS SO STIPULATED.**

4     Dated: December 14, 2018

Defiance Law PLLC

5                               /s/Kevin P. Smith

6                               Kevin P. Smith, WSBA No. 48578  
7                               Attorney for Plaintiff

8                               Harbor Law PLLC

9                               /s/Angie Lee

10                              Angie Lee, WSBA No. 47104  
11                              Attorney for Plaintiff

12                              Town Center Law

13                              /s/Attila Dennes

14                              Attila Denes, WSBA No. 40436  
15                              Attorney for Plaintiff

16  
17     Dated: December 14, 2018

Barran Liebman LLP

18                              /s/Andrew M. Schpak

19                              Andrew M. Schpak, WSBA No. 39901  
20                              Attorney for Defendant

21                              Harmon & Davies, P.C.

22                              /s/Laura B. Gallagher

23                              Laura B. Gallagher, Admitted *Pro Hac*  
24                              *Vice*  
25                              Attorney for Defendant

**ORDER**

The Court has considered the above stipulation of the parties. The stipulation is hereby adopted by the Court.

Dated: December 18, 2018



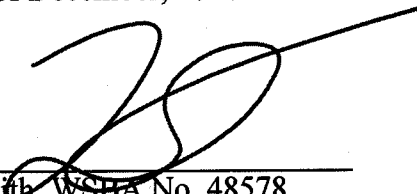
Hon. Marsha J. Pechman

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record in the above case.

DATED at Tacoma, Washington this 14th day of December, 2018.



Kevin Smith, WSBA No. 48578  
1115 Tacoma Ave. S.  
Tacoma, WA 98402  
Telephone: (253) 507-4769  
Email: [k.smith@defiance.law](mailto:k.smith@defiance.law)  
Attorney for Plaintiff Alan Kwang